

**REMARKS**

**Allowable Subject Matter**

It is noted, with appreciation that the Examiner has indicated that claims 14-22 although objected as being dependent upon a rejected based claim, would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

**Rejections under 35 USC §103**

Claims 1 and 23 stand rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Endo (U.S. Patent 6,928,927) in view of Guaraldi (U.S. Patent 5,678,485) and Wells (U.S. Patent 6,041,709). Claims 2 and 3 have been by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Endo, Guaraldi and Wells as applied to claim 1 and further in of Schaum (U.S. 5, 662,038). Claim 4 has been rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Endo, Guaraldi, Wells and Schaum as applied to claim 2 in further in view of Anderson (U.S. Patent 3,453,955). Claims 5-8 stand rejected under 35 USC §103(a) as being unpatentable over Endo, Guaraldi and Wells as applied to claim 1, and further in view of Weishew (U.S. Patent 6,412,409). Claim 9 has been rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Endo, Guaraldi and Wells as applied to claim 1, and further in view of Guaraldi '609 (U.S. Patent 5,301,609) and Luebke (U.S. Patent 5,109,768). Claim 10 has been rejected Examiner under 35 U.S.C. § 103(a) as being unpatentable over Endo, Guaraldi and Wells as applied to claim 1 and further in view of Guaraldi'609. Claim 11 has bee rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Endo, Guaraldi, Wells and Schaum as applied to claim 2 and further in view of

Guaraldi '609. Finally, claims 12 and 13 have been rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Endo, Guaraldi and Wells as applied to claim 1 and further in view of Edwards (U.S. Patent 4, 222,325). These rejections are respectfully traversed.

Claim 1, as amended, recites a printing module which comprises a main frame; an impression roller being rotatably bearing-mounted in the main frame; a plate cylinder assembly having a plate cylinder that is provided with a print image and that, in use, with the interposition of a substrate to be printed, abuts against the impression roller; an ink reservoir; a doctor roller configured to take up ink from the ink reservoir; an anilox roller being arranged between the doctor roller and the plate cylinder and configured to remove a desired amount of ink from the doctor roller and to transfer ink to the plate cylinder; a first subframe in which the plate cylinder is rotatably bearing-mounted and that is movably connected with the main frame for positioning, and setting a distance, of the plate cylinder relative to the impression roller; a second subframe in which the anilox roller and the doctor roller are rotatably bearing-mounted and that is movably connected with the first subframe for positioning, and setting a distance of, the anilox roller relative to the plate cylinder, such that a positioning change of the plate cylinder relative to the impression roller does not affect the positioning of the anilox roller relative to the plate cylinder and that a positioning change of the anilox roller relative to the plate cylinder does not affect the positioning of the plate cylinder relative to the impression roller.

Claim 23, as amended, recites a printing machine containing a printing module that comprises a main frame; an impression roller being rotatably bearing-mounted in the main frame; a plate cylinder assembly having a plate cylinder that is provided with a print image and which, in use, with the interposition of a substrate to be printed, abuts against the impression

roller; an ink roller; a doctor roller configured to take up ink from the ink reservoir; an anilox roller being arranged between the doctor roller and the plate cylinder and configured to remove a desired amount of ink from the doctor roller and to transfer ink to the plate cylinder; a first subframe in which the plate cylinder is rotatably bearing-mounted and that is movably connected with the main frame for the purpose of the positioning, and setting a distance, of the plate cylinder relative to the impression roller; a second subframe in which the anilox roller and the doctor roller are rotatably bearing-mounted and that s movably connected with the first subframe for the purpose of the positioning, and setting a distance, of the anilox roller relative to the plate cylinder, such that a positioning change of the plate cylinder relative to the impression roller does not affect the positioning of the anilox roller relative to the plate cylinder and that a positioning change of the anilox roller relative to the plate cylinder does not affect the positioning of the plate cylinder relative to the impression roller.

Initially, Applicant respectfully submits that the Examiner is combining different features from different types of printing devices, e.g., Endo's intaglio printing device, Guaraldi's offset printing device and Wells' flexographic printing device without presenting a proper reason why one of ordinary skill in the art would have an incentive to modify Endo's intaglio printing device in view of Guaraldi's offset printing device and Wells' flexographic printing device.

Applicant respectfully submits that these different types of printing devices are not comparable to one another enough to motivate one of ordinary skill in the art to combine them as suggested in this rejection.

Additionally, the characterization of the references in the rejection is not accurate. For example, in paragraph 3 of the Office Action, reference is made to a doctor roller 34 of Endo.

However, in Endo, element 34 is not a doctor roller, but is a scraping blade. Moreover, the intaglio printing device of Endo does not even use an anilox roller, and Endo does not disclose anything about the relative positioning of its impression roller, its plate cylinder assembly and its scraping blade.

Guaraldi, the secondary reference, discloses an offset printing unit. Moreover, Guaraldi's cylinder 19 is not an anilox roller, as asserted in the rejection, but is actually a print cylinder – see col. 3, line 45 of Guaraldi. Also, cylinder 30 is not an impression roller, but is actually another blanket cylinder that transfers ink to the back of the substrate.

Thus, these two references are significantly different from one another and from the claimed invention and, as a result, one of ordinary skill in the art will not have any incentive to turn to Guaraldi's offset printing device, mischaracterized as it is in this rejection, to modify Endo's intaglio printing device, mischaracterized as it is, as suggested.

Additionally, even if these two references were somehow combined, they would not disclose, suggest or otherwise render obvious, the claimed invention, which is neither an intaglio printing device nor an offset printing device.

Wells, the tertiary reference, deals with flexographic printing using anilox rolls. Unfortunately, neither Endo nor Guaraldi disclose flexographic printing using anilox rolls, so the Office Action has not clearly established that the teaching in Wells of using doctor blades and doctor rollers with anilox rolls is necessarily applicable to the use of a doctor blade in Endo.

Moreover, even if one of ordinary skill in the art were properly motivated to use a doctor roller instead of a doctor blade in Endo (which has not been demonstrated in the Office Action),

the so modified version of Endo-Guaraldi still would not disclose, suggest, or otherwise render obvious the claimed invention recited in claims 1 and 23.

With respect to the claimed features of “a first subframe in which the plate cylinder is rotatably bearing-mounted and that is movably connected with the main frame for positioning, and setting a distance, of the plate cylinder relative to the impression roller; a second subframe in which the anilox roller and the doctor roller are rotatably bearing-mounted and that is movably connected with the first subframe for positioning, and setting a distance of, the anilox roller relative to the plate cylinder, such that a positioning change of the plate cylinder relative to the impression roller does not affect the positioning of the anilox roller relative to the plate cylinder and that a positioning change of the anilox roller relative to the plate cylinder does not affect the positioning of the plate cylinder relative to the impression roller,” Weishew, the reference applied to address these features, does not disclose, suggest, or otherwise render obvious these features.

Applicant respectfully submits that what the Office Action characterizes as the second subframe 24a of Weishew is, in fact, a stationary, integral part of the stationary main frame 24. Geisha's frame 26 only moves in a transverse direction because it is a carriage, and may be fixed in a fixed position on the main frame 24 by a clamping device 60. The movable connection of Weishew's frame 26 with its main frame 24 is not configured as recited in claims 1 and 23, i.e., to position and set a distance of the plate cylinder relative to the impression roller.

The second subframe 24a of Weishew is an integral and fixed part of the main frame 24. The second subframe 24a is not movably connected with the frame 26 (which the office Action

treats as the first subframe) for positioning, and setting a distance of, the anilox roller relative to the plate cylinder.

Also, Weishew does not teach that a positioning of the plate cylinder relative to the impression roller does not affect the positioning of the anilox roller relative to the plate cylinder, and that a positioning change of the anilox roller relative to the plate cylinder does not affect the positioning of the plate cylinder relative to the impression roller. In Weishew, if gear 66 (see Fig. 1, and col. 7, lines 21-29) is actuated to lift the print cylinder 12 from the impression cylinder 18, the position of the print cylinder 12 relative to the anilox cylinder 14 is also changed.

Accordingly, the Office Action does not make out a *prima facie* case of obviousness of the claimed invention.

Reconsideration and withdrawal of these rejections of claims 1-13 and 23 are respectfully requested.

#### **Information Disclosure Statement**

Applicant is filing an Information Disclosure Statement along with this Amendment and asks that the examiner consider the reference filed therewith and provide Applicant with an initialed copy of the Form PTO/SB/08 filed therewith.

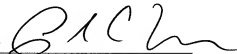
**CONCLUSION**

Should there be any outstanding matters that need to be resolved in the present application; the Examiner is respectfully requested to contact Robert J. Webster, Reg. No.46, 472 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.147; particularly, extension of time fees.

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Respectfully submitted,

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